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PROPOSED
1983 PLAN AMENDMENTS
TO
the California Desert

CONSERVATION AREA
PLAN

1980

Final Environmental Impact Statement

ted States Department of the Interior
Bureau of Land Management
California

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
California Desert District
1695 Spruce Street
Riverside, California 92507

IN REPLY REFER TO:
1600
(C-060.25)

Dear Reader:

Enclosed for your review and comment is the Final Environmental Impact Statement for the 1983 Plan Amendments to the California Desert Plan. The Final EIS has been prepared in an abbreviated format consistent with provisions of Section 1500 of CFR, the Council on Environmental Quality's regulations for implementing the National Environmental Policy Act of 1969. Text revisions or additions made in response to public suggestions are also presented. Therefore, this document should be used in conjunction with, rather than in place of, the Draft EIS.

My thanks to those of you who sent in comments and suggestions - I hope that you will continue to help us manage your public lands.

The decision to accept or to reject these proposed amendments will be based on a number of factors including effect on the natural environment, input from the public, and recommendations of the California Desert District Multiple-Use Advisory Council.

We are providing a 30-day period for public review. Final decisions will be announced shortly after the end of that period. Amendments which are accepted will be in effect at the time final decisions are published. Please be sure to return your comments to this office no later than MARCH 5, 1984 ; protests must be filed with the State Director in Sacramento by the same day. Send your comments to the following address:

California Desert District
Bureau of Land Management
Attn: Plan Amendments
1695 Spruce Street
Riverside, California 92507

Sincerely,

Gerald E. Hillier
District Manager

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Final Environmental Impact Statement

PROPOSED 1983 AMENDMENTS TO THE CALIFORNIA DESERT CONSERVATION AREA PLAN

Prepared by
Department of the Interior
Bureau of Land Management
California Desert District

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Denver, CO 80225-0047

The Bureau of Land Management is conducting its 1983 review of the California Desert Plan. This Environmental Impact Statement considers the environmental consequences of accepting or rejecting each of the 14 proposed amendments which have been accepted for consideration. Amendments fall into several categories, including desert-wide amendments, site-specific vehicle access changes, livestock grazing adjustments, ACEC and special area designation changes, and multiple-use class changes. Under the Bureau's preferred alternative, ten amendments would be accepted and four would be rejected. Desert-wide Class C acreage would change from 1,839,640 to 1,655,940, Class L would change from 6,070,050 to 6,259,950, and Class M would change from 3,370,560 to 3,364,360, and Class I would remain unchanged.

Ed Hastey
STATE DIRECTOR
CALIFORNIA STATE OFFICE

For Further Information Contact:

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SUMMARY

PLAN AMENDMENTS

In accordance with the procedures set forth in Chapter 7 of the California Desert Plan and with 43 CFR 1600 (BLM Planning Regulations), the Bureau of Land Management, California Desert District has initiated the third amendment review of the plan.

Proposals for amendments were accepted during a 45-day period from mid-March until April 30, 1983. Approximately 40 proposals were made by the public and by BLM staff for consideration. These amendments were screened by BLM management and the California Desert District Advisory Council to determine which proposals should be considered at this time and which should be deferred, dropped, or handled more appropriately by an administrative action. Fourteen amendments were recommended for consideration:

Category	Number	Description
Vehicle Access	1	Add East and West Cronese Lakes to significant list and designate them "closed".
	2	Add Ibex Dunes to significant list and designate them "closed".
	3	Close 18,000 acres of the Devils Playground south of Soda Dry Lake.
Lands	4	Clarify multiple use class guidelines to guide land sales.
Multiple Use Class Changes	5	Change Planning Units 44e/48e from Class "M" to Class "L".
ACECs/Special Areas	6	Change Creosote Rings ACEC from "unclassified" to Class "L".
	7	Designate new ACEC to protect Sclerocactus polyancistrus habitat near Helendale.
	8	Designate new ACEC south of Desert Center (Alligator Rock) to protect archaeological sites.

Category	Number	Description
Grazing	9	Change classification of Pilot Knob grazing allotment from ephemeral to ephemeral/perennial.
	10	Expand Cronese grazing allotment.
	11	Expand Ord Mountain Grazing allotment.
Wild Horses and Burros	12	Delete the Panamint Herd Management Area (concentration areas 8, 10, and 12).
Wilderness	13	Change Santa Rosa Mountains (former WSA 341) from Class C to Class L.
	14	Change Orocopia Mountains (former WSA 344) from Class C to Class L.

ENVIRONMENTAL CONSEQUENCES

Impacts have been assessed for accepting each amendment or one of its alternatives, as well as for rejection of the amendment. Table S-1 summarizes those impacts.

TABLE S-1

CANDIDATE AMENDMENTS ---- SUMMARY OF IMPACTS

X = POSITIVE IMPACTS

- = NEGATIVE IMPACT

Amendment No.	Amendment	Soil - Air - Water	Botany	Wildlife	Horses/ Burros	Cultural Resources	Native Americans	Wilderness	Visual Resources	Livestock Grazing	Recreation	Lands	Geology/ Energy/ Minerals
1.	CRONESE LAKES			X		X							
2.	IBEX DUNES												
3.	DEVIL'S PLAYGROUND			X		X					-		
4.	LAND SALES GUIDELINES											X	
5.	PLANNING UNITS 44e/48e			X									-
6.	CREOSOTE RINGS ACEC		X										
7.	SCLERACACTUS ACEC												
	Alternative A		X	X									
	Alternative B												
8.	ALLIGATOR ROCK ACEC					X							
9.	PILOT KNOB ALLOTMENT												
	Alternative A			-						X			
	Alternative B			-						X			
10.	CRONESE LAKE ALLOTMENT												
	Alternative A			-		-							
	Alternative B									X			
	Alternative C			-		-							
11.	ORD MTN ALLOTMENT												
	Alternative A			-		-				X			
	Alternative B			-						X			
	Alternative C			-						X			
12.	PANAMINT HMA												
13.	SANTA ROSA MTNS												
	Alternative A												
	Alternatice B			-		-		-			X		
14.	OROCOPIA MTNS			-				-			X		

SELECTION OF PREFERRED ALTERNATIVE

Based in part upon the amendment-specific impacts, the results of the public review of the draft EIS, and the recommendations of the Desert District Multiple Use Advisory Council, a preferred alternative was selected, either to accept, reject, or accept an alternative version of each amendment. This choice does not represent a final decision, but simply indicates a preliminary recommendation to be presented in the final EIS for public review and comment. The cumulative impacts of this preferred alternative are presented in Table S-2 below:

TABLE S-2
SUMMARY OF CUMULATIVE IMPACTS

Resource	Unit of Measure	No Action	Preferred Alternative	Percent Change	New Percent Of Desert
Multiple Use Class (CDCA)					
C	Acres	1,839,640	1,655,940	-10	13.7 (17.3)*
L	Acres	6,070,050	6,259,950	+3	51.6 (48.5)*
M	Acres	3,370,560	3,364,360	0	27.8 (27.5)*
I	Acres	522,610	522,610	0	4.3 (4.1)*
Unclassified	Acres	314,000	314,000	0	2.6 (2.6)*
ACECs Added					
	Number	0	3		
	Acres	0	75,000		
Livestock Grazing					
Ephemeral Allotments	Number	16	16		
	Acres	1,619,879	1,645,879		
Ephemeral/Perennial Allotments	Number	65	65		
	Acres	2,462,131	2,495,731		
Perennial Allotments	Number	13	13		
	Acres	749,668	749,668		
Motorized Vehicle Access					
Open	Acres	523,000	523,000		
Limited	Acres	9,304,000	9,286,000		
Closed	Acres	1,978,000	1,996,000		
Point-to-Point Race Course/Corridors	Number	4	4		

* Percent of Area in Original Plan

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CHAPTER I

AMENDMENTS

CHAPTER I

AMENDMENTS

INTRODUCTION

Fourteen proposed amendments to the California Desert Plan have been accepted for consideration. Each amendment has been considered individually for either acceptance or rejection. The rejection of an amendment represents the "no action" alternative. Additional alternatives have been proposed for several of the amendments which present modified versions of the proposal. Each amendment, together with the proponents rationale for decision, the Bureau's preferred alternative (acceptance, acceptance of a modified version, or rejection), and the rationale for the preferred alternative, are presented in Table 1-1.

The preferred alternatives for Amendments 7 and 11 have been changed from those recommended in the Draft EIS. Amendment 7, the proposed ACEC for Sclerocactus polyancistrus, would be rejected. ACEC designation is not necessarily required to give this area priority for protection. Measures needed to protect the Sclerocactus will be taken by the Bureau.

Amendment 11, which was rejected in the DEIS, is now recommended for partial acceptance. New information obtained during the public review period warranted a second look at the proposal. The EIS team made a field tour of the allotment and found that (1) a grazing allotment could be managed within an open area, and (2) boundaries could be drawn so that impacts on sensitive resources would be much lower than those predicted for the originally proposed expansion (Alternative A). The revised analysis is given in Chapter IV (Modifications and Corrections). The amendment is now proposed for partial acceptance as constrained by measures indicated in the "Rationale for Selection of Preferred Alternative" in this chapter.

Amendments 13 and 14 will continue to be processed as described in the DEIS. These amendments would change the Multiple Use classification of the Santa Rosa Mountains and the Orocopaia Mountains (former WSAs 341 and 344) from Class C to Class L, as a result of the Secretarial Order of 12/30/82 which required the deletion from wilderness consideration of WSAs with "split estate mineral lands." Although this Order was set aside by an injunction on 9/9/83, deferment of these amendments at this point would make it necessary to repeat the whole process, if the Order is upheld. Therefore, if the litigation is settled in favor of the Department of the Interior, or if no decision has been announced, a Record of Decision will be issued according to the recommendations under consideration here. If the Secretarial Order is voided, it may become necessary to reconsider these actions.

Table 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
	VEHICLE ACCESS			
1	AMENDMENT: Add the East and West Cronese Dry Lakes to the "significant list" in the Motorized Vehicle Element and designate them "closed" to motorized vehicle use.	The Cronese lakes are sensitive because of wildlife habitat and because of many cultural sites located along the shoreline. (East Cronese lake is an ACEC; both are Class "L")	Accept	Present recreation use of lakebeds is low. There are high densities of archaeological sites on the shorelines. The lakebeds are used as migratory stopover for waterfowl. Closure would prevent disturbance, as well as protecting waterfowl food sources. East Cronese has been filled with water each of the past five years.
2	Add the Ibex Dunes to the "significant list" in the Motorized Vehicle Element and designate it "closed" to Motorized Vehicle use.	The dunes (Class M) are located partly in Death Valley National Monument. The Death Valley portion is closed to vehicle use. The adjacent public land portion should also be closed.	Accept	Nearly 90 percent of dunes are in Death Valley and are already closed. No known ORV use of BLM portion. Dunes isolated from public land outside monument by Saddle Peak Hills. Would allow consistent management of dunes.
3	Close approximately 18,000 acres of public lands in the Devils Playground south of Soda lake to vehicle entry.	Rasor Open Area to the west is attracting increasng numbers of ORV users. A closure south of Soda Lake would: 1) clearly show what use patterns are allowed in the region; 2) protect cultural resources being endangered by ORV use; and 3) protect mesquite hummocks from collection for firewood and from ORV play.	Accept with Modification	Amendment is approved with the following modification: the Bureau reserves the right to authorize occasional travel in this area for seasonal, educational, or scientific, purposes on a selective case-by-case basis. The adjacent Rasor Open Area was enlarged to the west not only to provide a manageable area for ORV use, but also to provide an alternative to use of the environmentally sensitive Devil's Playground. No

Table 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
				opportunities for recreation would be lost; rather, the two amendments complement each other. Due to the nature of existing routes, the Devils Playground is unlikely to be opened by the route designation process. Therefore, the amendment would clarify closed area management.
	LANDS			
4	Clarify Multiple-Use-Class Guidelines for land sales. Class C: Public Lands will not be sold. Class L: Sales of public lands allowed in accordance with FLPMA and other applicable Federal laws and regulations, but only where disposal is in public interest and it is determined to be highest and best use. Proposed use must be consistent with historical use and the low-intensity management philosophy of Class L. Sales in WSAs would not be allowed until after Congress acts. Classes M and I: Sales of public lands may be allowed in accordance with FLPMA and other applicable Federal laws and regulations. Sales in WSAs would not be allowed until after Congressional action. Unclassified: Sales of public lands may be allowed.	Need to clarify Land Tenure adjustment and Asset Management in MUC classes, including disposal of public land by sale.	Accept with Modification	Amendment is partially accepted. Public lands will not be sold in classes C, L, and I. Land sales will only be allowed in class M, and unclassified lands, subject to FLPMA and other applicable Federal laws and regulations. Lands in classes C, L, and I could only be sold after first changing their classification through the plan amendment process. The Desert Plan is not specific concerning the sale of public land in all but "unclassified" areas. Proposed guidelines would complement other land sale and tenure adjustment tools (such as exchanges and Recreation and Public Purposes applications) already detailed in Land Tenure Element.

Table 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
	In existing guidelines, replace "disposed of or exchanged" with "through exchange, purchase, or other means."			
	MULTIPLE USE CLASS CHANGES			
5	Change P.U. 44e/48e (area east of Shoshone) from "M" to "L".	A thermal cave which contains several species of endemic cave vertebrates is located in the area. Alteration of this cave environment would probably result in their extinction. The area also contains a portion of the Amargosa River drainage which flows into the Grimshaw Lake and Amargosa ACECs. Reduction in water flow or quality could have a serious impact on many rare forms of wildlife and associated wetland habitats present within these ACECs. A change in class from "moderate" to "limited" is warranted as a protective measure for these sensitive biological resources. The area in question does not have high mineral potential, and a class change would not preclude the opportunity for mineral exploration and development here. It would provide, however, far more time to carefuly review mining measures, contact and consult with other wildlife agencies, and develop protective mitigation measures to reduce or eliminate adverse impacts.	Accept	Class L designation recognizes the sensitive biological resources in the area and allows for mineral exploration and development (even though the area has low mineral potential) in a manner that takes into account the important wildlife values. Plans of operations are the appropriate tool to properly review and plan for mineral development activity.
	AREAS OF CRITICAL ENVIRONMENTAL CONCERN			
6	Change the Creosote Rings ACEC from "unclassified" to MUC "L". (Approx. 278 acres of public lands in T. 4 N., R. 3 E., Section 17).	The approved management plan for this ACEC has identified the need to change this area to Class "L". "Unclassified" lands imply a disposal intent. The management plan commits BLM to long-term protection. The MUC should be changed to implement the management plan and to ensure consistency with class guidelines.	Accept	ACEC designation implies a long-term objective of maintaining lands in public ownership. Class L designation is more consistent with this goal. Although on-the-ground management would be no different than for "unclassified" land, class L would clearly segregate this area from the nearby Johnson Valley Open Area, resulting in less inadvertent damage from ORVs.

Table 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
7	Protect habitat of Sclerocactus polyancistrus east of Helendale by: Alternative A: Designate an ACEC Alternative B: Change those portions of this area which are unclassified to Class M.	Amendment is resubmitted. Proponent maintains that area is an important site for study of this species. Extremely rare yellow-spined form of S. polyancistrus also occurs here.	Reject	Although an ACEC designation would allow the development of protective measures for a representative stand of this species, an ACEC is not necessarily required for priority for protection. Measures necessary for the protection of the Sclerocactus will be taken by the Bureau.
8	Designate a new ACEC (12 square miles) south of Desert Center for protection of archaeological sites. Name of ACEC will be "Alligator Rock".	Since completion of the Desert Plan, 22 archaeological sites have been recorded here; two are on the National Register of Historic Places. Recreation use presents serious threat to these cultural resources.	Accept	This very significant complex of sites represents a microcosm of the archaeology of the Indio Resource Area. It gives evidence of having had an exceptionally long and continous history of use, and is tied in by trails to all of the major rock sites in the resource area. One of the National Register sites is being published in a Cambridge University Press publication quarry sites, giving this site national significance. Class L guidelines along are insufficient to establish controls to prevent site damage. ACEC designation would allow restriction of camping and access, as well as fencing, to control inadvertent damage of sites without unduly restricting current use. A significant group of archaeological sites and their surrounding environment would be preserved.

Table 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
	GRAZING			
9	Modify Pilot Knob grazing allotment from ephemeral to ephemeral-perennial. Consider two alternatives: Alternative A: Year-Round Grazing Alternative B: March to October Season of Use.	Operator wishes to change from a "stocker" operation to a "cow/calf" operation which requires a year-round lease.	Defer	Although perennial forage is available, year-round grazing would create significant conflicts with wildlife, while a cow/calf operation would not be feasible under seasonal grazing. Lacking the knowledge and facilities necessary to manage these conflicts, approval at this time would be pre-mature However, a perennial allotment could be re-considered after the development of an AMP which included an evaluation of range grazing capacity and the development of a monitoring system. Therefore, the AMP will consider three alternatives: an ephemeral allotment, a perennial/ephemeral allotment with year-round grazing, an a perennial/ephemeral allotment with a March to October season of use. The AMP and its Environmental Assessment will be circulated for public review. If either of of the latter two alternatives appear biologically and economically feasible, the amendment will be approved at that time. If not, the amendment would be rejected.
0	Expand Cronese Grazing Allotment. Consider three alternatives: Alternative A: Expand northeast to the Soda Mountains and west to the	Addition of these sections to the present allotment would better utilize BLM land and provide revenue from grazing fees.	Accept Alt. B	While ephemeral forage is present, there is insufficient perennial base to, warrant an ephemeral/perennial designation. Rejection of

Table 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
	western edge of R. 2 E., north of T. 10 N. Alternative B: Expand west only as far (formerly Afton Canyon) allotments. Alternative C: Same as A. In addition, expand southeast to include all land between Cronese and Cady Mountain (formerly Afton Canyon) allotments).			Alternatives A and C avoids conflict with wildlife (desert tortoise and bighorn sheep) and cultural values.
11	Enlarge Ord Mountain Allotment to include acquired SP land surrounding present allotment. Consider two alternatives: Alternative A: Expand to Western Boundary of Marine Base. Alternative B: Same as A, excluding the Rodman Mountains. Alternative C: Same as A, excluding part of Rodman Mountains	For proper range management.	Accept Alt. C	Only part of the Rodman Mountains would be excluded from the expansion area. Little forage is available in this excluded area, which possesses extremely sensitive wildlife and cultural values. Excluding only part of the Rodmans would allow use of the area containing the best forage. However, several miles of fencing would be required to make this a manageable alternative. The southern portion of the expansion aea would be within the Johnson Valley Open Area; where conflicts would be likely to occur, recreation activities would be given preference.
	WILD HORSE AND BURROS			
12	Delete the Panamint Herd Management Area (conc. areas 8, 10, & 12) of the Saline/Panamint Herd Management Planning Area for burros.	Following approval of CDCA Plan, China Lake Naval Weapons Center and Death Valley National Monument completed management plans calling for removal of burros on land under their administration, making retention of burros in the Panamint Valley unfeasible.	Accept	Burro migratory patterns overlapping all three jurisdictions makes maintenance of a population in one impractical when removal would be practiced in the others.

Table 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
	WILDERNESS			
13	Change multiple use class of the former Wilderness Study Area 341 (Santa Rosa Mountains, approximately 68,051) acres. Consider two alternatives: Alternative A: Change to Class L; designate area as an ACEC. Alternative B: Change to Class L.	The area has been dropped from WSA status due to "split estate" mineral rights. See Supplemental Information, page 2.8.	Accept Alt. A	Because of the split mineral estate and the resulting Checkerboard land ownership pattern, this area was eliminated from WSA status. Elimination of WSA status changes neither the class C designation nor the suitable for wilderness recommendation. If designated wilderness, Southern Pacific (or its successors in interest of the mineral estate) would retain valid existing rights to surface entry. Class L would be more consistent with the management problems this could create. However, there are sensitive wildlife values (including a large herd of Peninsular bighorn sheep) within the area that do require more protection than would be provided by class L guidelines alone. ACEC designation would provide a framework for additional protection measures not stressed in the 1980 Santa Rosa Habitat Management Plan because of the existing IMP protection.
14	Change multiple use class of the former Wilderness Study Area 344 (Orocopia Mountains) to Class L (approximately 44,195 acres).	Most of the area was dropped from WSA status due to "split estate" mineral rights. The remaining area, still over 5,000 acres, did not meet other Section 2(c) criteria outlined in the Wilderness Act.	Accept	Elimination of WSA status changes neither the class C designation nor the suitable for wilderness recommendation. If designated wilderness, Southern Pacific (or its successors in interest of the

Table 1-1
Description of Amendments

Amendment Number	Amendment	Proponent's Reason for Submission	Preferred Alternative	Rationale for Selection of Preferred Alternative
				mineral estate) would retain valid existing rights to surface entry. Class L would be more consistent with the management problems thris would create, and would provide adequate protection for the area's resources.

CHAPTER II

SUMMARY OF PUBLIC COMMENTS

CHAPTER II

SUMMARY OF PUBLIC COMMENTS

CHARACTERISTICS OF THE RESPONSE

The Draft Environmental Impact Statement (DEIS) on the 1983 Amendments to the California Desert Plan was released for public review on September 9, 1983. The comment period extended to December 9, 1983. Eighty letters or postcards were received during this period. None of these were signed by more than two people. Oral hearings were not held, but the opportunity to comment was provided at the November meeting of the Multiple Use Advisory Committee in San Diego.

Geographic distribution of respondents differed from that for the 1982 Amendments, in that there was a higher percent of CDCA residents (15% compared to 9%)and a lower percent of Northern Californians (28% compared to 37%). The proportion of Southern Californians outside the CDCA remained the same at about 50%.

Table 2-1

GEOGRAPHIC ORIGIN OF RESPONSES

Origin		Responses
CDCA		12 (15%)
Non-CDCA Southern Calif.		39 (48%)
Non-CDCA Northern Calif.		23 (28%)
Nevada, Arizona		3 (4%)
All Others		4 (5%)
	TOTAL	81 (100%)

The proportion of input by individuals was lower than usual - 59%, compared to 87% for the 1982 Amendments and 80% for the 1980 Proposed Plan and Final EIS. Input by governmental agencies was higher than in 1982 and 1980 - 25%, compared to 3% and 2%, respectively. Organizational input was also higher - 15% compared to 10% and 8% in 1982 and 1980.

TABLE 2-2

TYPE OF RESPONDENT

Respondent Type	Responses
Individuals	48 (59%)
Organizations & Businesses	20 (25%)
Government	12 (15%)
Utility	1 (1%)
	81 (100%)

GENERAL OVERVIEW

The relatively small number of responses and the reduced proportion of individual commenters indicate that the present amendments were much less controversial than the 1982 Amendments or the Proposed Plan/Final EIS. Individuals allowed their organizations to speak for them, and fewer organizations participated this year.

The major emphasis of the comments was protection of the desert environment against perceived impacts of grazing and increased access for vehicle recreation or mineral exploration. The opposite view was expressed by some respondents, who favored less restrictions on vehicles, particularly for mineral exploration. These comments will be summarized below, followed by a review of specific input on plan amendments.

SUMMARY OF GENERAL COMMENTS

The BLM was complemented by several respondents on the generally protective nature of the 1983 Amendments . The reduction in the number of proposals considered this year was also approved by most commenters, although one complained that too few of the amendments submitted by mining interests had been considered.

A few respondents claimed that the BLM is "amending the Desert Plan to death." The suggestion was made that amendments should be made at 5-year intervals instead of annually. The cost of the amendment process was given as the reason, and the suggestion was made that the money would be better spent by implementing the Plan.

A large group opposed any enlargement of grazing allotments or changes to greater use in existing allotments. Effects on vegetation and wildlife, particularly the desert tortoise, were the the reasons.

The Bureau was chided for even consiering expansion of grazing allotments which had been limited during Plan preparation due to the presence of very sensitive resources. Consideration of grazing amendments was felt to be a waste of limited funds, since all should have been rejected in the first place. Some felt the EIS provided insufficient information about vegetation, the possible presence of rare plants, and carrying capacity to permit an informed decision on the advisability of grazing expansion. Indeed, one writer commented that the BLM should reject all attempts to increase grazing until it learns more about range conservation.

Some different views on interactions between burros and bighorns were presented by one respondent, who questioned the necessity to reduce burro populations (Amendment 12). However, the vast majority of comments on this amendment was favorable to burro reduction.

One organization spoke out against the use of ACECs as a management tool to protect large acreages of land. They said that ACECs were not intended for this purpose.

Wilderness was championed by many respondents who disagreed with the decision to change "split-estate" lands to Class L. Most preferred to hold off Amendments 13 and 14 until a final legal action had been taken on the "split--estate" issue.

Miners again requested that a full assessment of the mineral potential of desert lands should be completed before lands are closed to access for exploration. They urged that a procedure be established to permit compatible mineral exploration on lands having sensitive natural resources.

Comments were also received from the State of California's Office of Historic Preservation. The State Historic Preservation Officer determined that no National Register and/or eligible properties will be affected by the amendments.

SUMMARY OF COMMENTS BY AMENDMENT

Amendment 1. Close Cronese Lakes to Motorized Vehicles.

Proponents of the amendment made up the majority of commenters. Reasons given were protection of cultural values, migratory waterfowl habitat, and rare plants.

Opponents reasoned that management of sensitive resources could be accomplished by the route designation process and by education of ORV users.

- Closure of the areas to vehicular travel may add a burden to exploration for mineral resources. Consideration should be given to the fact that saline minerals, zeolites or other undiscovered mineral resources, may exist beneath, or in the vicinity of, the lakes.

Amendment 2. Close Ibex Dunes to Motorized Vehicles.

Acceptance of this amendment was almost unanimous. Consistency with the management of Death Valley National Monument and protection of dune biota were predominant reasons.

An organization opposing the closure pointed out the history of low usage of this dune system and the desire of some ORV recreationists to be off by themselves.

Amendment 3. Close Devil's Playground Area South of Soda Lake.

This proposal drew the largest number of comments, almost double that received for any other amendment. Proponents made up the vast majority of respondents. They emphasized protection of archaeological sites, wildlife communities in mesquite hummocks, the south shore of Soda Lake, and the western portion of the East Mojave National Scenic Area.

The following are some typical comments:

- This treasure of archaeological sites and wildlife should be protected from the current off-road vehicle abuse now taking place.
- The natural and archaeological values present in this area far outweigh the dubious benefits to be gained by allowing continued vehicle access.
- Closure of the 18,000 acres south of Soda Lake to vehicles will greatly enhance the educational values of Devil's Playground.
- This western boundary of the East Mojave National Scenic Area has to be protected from spillover from the Rasor Ranch ORV Open Area.
- Rasor Open Area is nearby, there is no need to keep this area of Devil's Playground open.

Opponents denied the need for closure, stating that any spillover was due to faulty BLM maps. They suggested an educational approach for informing users of the area's resources.

- Here is an area that is currently Class "L", and by the restrictions in Class "L" can be managed as it is, by proper education of the user. This is a perfect opportunity to make the small amount of "overflow" users aware of the area's resources.

- This proposal is outrageous! The reasoning for closure is absurd. The "spill over" is due to the Bureau's misprinting of the map location for the Rasor open area. The Devil's playground had been a super vehicle recreation area for many years.

Amendment 4. Clarify MUC Guidelines For Land Sales.

This proposal drew fewer comments than the other amendments. Most respondents were against the amendment. Some opposed the selling of any public lands, and favored land exchanges. Others feared that permission to sell other than "unclassified" lands would prevent public input on proposed land sales. Specific comments on the language of the proposed guidelines are dealt with in the next chapter.

The following are typical comments:

- Existing guidelines are quite clearly stated in the 1980 Final EIS And Proposed Plan for the CDCA, and the proposed amendment seems to be nothing other than an attempt to circumvent the intentions of FLPMA.

- We strongly oppose this amendment as written. We believe the land tenure adjustment and management plan should be clarified, but in another way. We oppose all land sales except in the case of isolated parcels with little or no value to the public, where the cost of managing the land exceeds the benefits to the public and only if exchange is not possible or would not result in an improved land management cost benefit ratio.

- It makes it too easy for private profiteers to get what they want at our expense, and gives no assurance of environmental protection for lands turned over to private use - this alone can create tremendous future headaches in managing federal lands adjacent to these sale areas.

- We would remind the BLM that FLPMA (Section 601) mandated the CDCA plan "for the immediate and future protection and administration of the public lands in the California Desert" (emphasis ours). Although sale may qualify as a form of administration, we cannot see that it normally fulfills the added requirement of protection.

Amendment 5. Change PU 44e/48e from "M" to "L".

Most correspondents disagreed with rejection of this proposal, believing that protection of wildlife and riparian habitat was more important than easing the "regulatory burden on the mining public":

- The Amargosa River drainage from Ash Meadows down through Amargosa Canyon consists of valuable wetlands providing crucial habitat for large numbers of wildlife and many species of rare plants which are endemic to the habitat. There is no valid reason for not increasing the level of protection in this exceptional area. Class L would still allow mining plans of operation to be filed and also allow for their close scrutiny.

- LAAS [Los Angeles Audubon Society] believes, however, that small-scale development (areas of less than 5 acres) also has potentially adverse effects which should be given due consideration. Since the recent changes in 43 CFR 3809 surface mining regulations prevent such consideration on Class M lands, these units should be changed to Class L.

- Rejection of this amendment is primarily to reduce the regulatory burden on the mining public - what burden? Most of the regulations are neither enforced nor is compliance required many times. Rejection is proposed purely to reduce the paperwork an operator needs to file, and to reduce delays to operators - such things are a small price to pay if operators really want the minerals.

An opponent of the proposal expressed doubts that rare plants exist in the subject area and stated that "you can't back up everything that is not currently developed for the sake of conservation itself."

- There are no rare plants and to say they may exist because they are in a nearby areas is like assuming there may be buffalo because someone saw one in Montana or Wyoming in exactly the same type of terrain. To assume is no valid reason to change to Class "L".

- We support the rejection of this proposal. The area has already undergone a "plan" to protect its "habitat".

Amendment 6. Creosote Rings ACEC: Change From "Unclassified" to MUC "L."

Proponents agreed that the proposal would protect vegetation and wildlife and that having an ACEC on unclassified land is inconsistent with long-term management goals.

The single opponent noted that the class change would not affect road use and that interpretative signs could handle any problems.

AMENDMENT 7. Sclerocactus ACEC.

Most respondents favored the creation of an ACEC to protect the Mojave fishook cactus (Sclerocactus polyancistrus). Concern was also expressed over the desert tortoise which is found in this area. Several respondents urged that the ACEC should be placed in Class L.

A few commenters endorsed Alternative B which would change the unclassified portion of the subject area to Class M, since this would allow controlled mineral entry in a location which is close to areas containing gold, silver, copper and mercury.

An opponent of ACEC designation stated that this action would not solve the problem of cactus poachers.

Amendment 8: Designate Alligator Rock ACEC

This proposal received almost unaninmous approval. Protection of archeological sites and rare plants were the major reasons, although desert tortoises were also mentioned.

Opponents stated that creation of an ACEC would not prevent damage to cultural sites by the public and that the excessive size of the proposed ACEC would restrict recreation uses.

Amendment 9: Change Pilot Knob grazing allotment to ephemeral-perennial.

Most respondents opposed a year-long ephemeral/perennial allotment (Alternative A) because of potential negative effects on the Mojave ground squirrel, the desert tortoise, and on cultural resources.

One commenter favored Alternative B, May to October ephemeral/perennial use, because of economic hardships on the operator.

Only one respondent supported the amendment (Alternative A); no reason was given.

Representative comments were:

- The area has not been adequately assessed for available perennial versus ephemeral forage.
- Two rare plants are mentioned, one as being present in the area, the other probably so. Further study of these and general vegetation should be done.
- The matter of a grazing operator and his finances is not germane to decisions regarding range grazing capacity.

- The amendment would adversely impact both crucial and highly crucial habitat of the desert tortoise. Also, the Mojave ground squirrel would be harmed.

- In addition, a sufficient monitoring program has been established for the allotment.

AMENDMENT 10. Expand Cronese Grazing Allotment.

Protection of the desert tortoise was the major reason for opposing this amendment, a position taken by most respondents. Concern for the desert bighorn sheep and the Mojave fringe-toed lizard were also mentioned.

Alternative B, expanding the grazing allotment only to the west, was approved by a small number of commenters. Only one respondent approved Alternative A. No reasons for approval were given.

Opponents gave the following reasons:

- The allegation that expansion would "better utilize BLM land," p. 2-6, is totally unsupported while the increase in grazing fee receipts that will result would be insignificant.

- Alternative C rejecting this proposed Amendment is cruicial. As noted in the Plan Amendments, the effect on the desert tortoise would be devastating.

- The modified expansion of the grazing allotment, proposed as Alternative B, would not significantly reduce impacts to wildlife.

- The Cronese Allotment should not be expanded into the Alvord Mountain area until the Barstow-Vegas Motorcycle-race-destruction-area has been allowed to recover for a few years.

Amendment 11: Enlarge Ord Mountain Allotment

This proposal prompted a large response. Almost all correspondents were opposed to any increase in grazing. The predominant reasons were protection of wildlife and cultural resources. There was particular concern about the desert tortoise. The following are some typical comments:

- Rejection of the amendment would best protect the Newberry/Granite Mountains Raptor Breeding Area.

- I oppose this amendment because it would have negative effects on habitat of the desert tortoise where tortoise densities range up to 100 per square mile. BLM's rejection of the amendment is appreciated.

- Reject the amendment. It has already been rejected once and further studies have only proven to substantiate the decision. Water re quirements by grazing animals and damage to cultural areas are my concerns.

- The Ord Mountain Grazing Allotment should not be expanded into the Rodman Mountains Wilderness Area--a precious archeological, petroglyph, wildlife, and nature study area.

- Competion for food and water would have negative impacts on a variety of wildlife including raptors, chukar, cottontail, mourning doves, desert tortoise, and bighorn sheep. Wilderness values will also be in jeopardy if the amendment is not rejected.

A proponent of the amendment made the following comments:

- It is obvious to one who knows the country, that the alternatives in amendment eleven were put there by someone who is very misinformed with the activities of livestock, wildlife, water, and vegetation of the area.

- The raptors in the expansion area do better than 50% of their watering and hunting within the present ranch boundaries.

- We are in the cow business for the production of beef. Not an expedition of cattle and rancher's trampling indian graves, killing turtles, and starving eagles.

Amendment 12: Delete portions of Panamint Herd Management Area (Conc. area 8,10, and 12).

Respondents to this proposal were highly in favor of deleting the specified burro concentration areas. Consistency with burro management goals of the Naval Weapons Center and Death Valley National Monument and positive effects on bighorn sheep and other wildlife were the reasons given.

Questions of one respondent on the validity of prevailing views on conflicts between burros and bighorn sheep are addressed in the next chapter.

Amendment 13: Change Multiple Use Class of Former WSA 341 (Santa Rosa Mountains) to Class L and Designate Area as an ACEC.

Respondents on this proposal were evenly divided between those who wanted no action at all and those who wanted to designate the area Class L. Of the latter, the majority favor ACEC status (Alternative A).

Proponents of Alternative A believed that ACEC status would provide needed protection for bighorn sheep and the slender salamander. Some expressed the feeling that an ACEC was the best solution if wilderness designation were not possible. One respondent preferred ACEC status, since intensive study and management of the bighorn population will require intrusions that are inappropriate for a wilderness area.

- If this area is not designated as wilderness the amendment would provide the best protection to the large bighorn sheep herd...and the slender salamander population.

- Short of wilderness protection, this option is outstanding. Alternative A would increase the protection afforded the Santa Rosa Mountains and its inhabitants.

Proponents of Alternative B opposed ACEC status which they thought would discourage mineral exploration. One commenter maintained that the area is too big for ACEC status, and that Class L designation, alone, would protect against damage from future mineral exploration.

- The Santa Rosa Mountains are still relatively unexplored; however, two lode gold and one placer gold are known to exist (Oro Vista, Garnet Queen and Black Eagle Placer). The geologic setting is such that the mountain range has mineral potential. Designation of the area as Class L would allow controlled mineral entry and exploration. To designate the area as an ACEC would unduly discourage exploration.

- This area is too big for ACEC status. That form of Land Management is being used to solve all problems. It was not designated to do this.

Respondents favoring "no action" stressed high wilderness values of the Santa Rosas. Many believed the amendment was premature, since the legality of removing split-estate lands from WSA status is being challenged in the courts. They urged rejection or deferment of any change until the case is settled. Representative comments were:

- This proposal appears strictly to cater to the GEM program, again a single resource interest.

- This de facto wilderness is rich in scenic, wildlife and archaeological values.

- I understand that dropping WSA status may have been illegal and that WSA status may still apply. Only if the area is removed from wilderness consideration should any change be contemplated.

- A land exchange program should be initiated to obtain mineral rights within the WSA.

- The BLM protion of the Santa Rosa Mountains should be transferred to Anza Borrego State Park so that they will be managed properly.

Amendment 14: Change Multiple use Class of Former WSA 344 (Orocopia Mountains) to Class L.

Opponents of this proposal outnumbered proponents by about 2 to 1. Proponents included those who accepted the necessity to make a class change and agreed that Class L would be the best alternative to Class C. Others were people interested in mineral exploration, as well as vehicle recreationists.

Opponents made the same type of comments about the "split-estate" issue as for Amendment 13 and emphasized the wilderness values of the Orocopia Mountains. Protection of wildlife - the bighorn sheep and desert tortoise - was also mentioned.

- Management of the desert bighorn sheep (Ovis canadensis nelsoni) and the desert tortoise in the Orocopia Mountains can best be accomplished by retaining the "suitable for wilderness" designation.

- Proposing doing away with the Orocopia Mountains Wilderness is outrageous. This is a wonderful wilderness experience area.

- I feel that too many of your reclassifications reflect more interest in the expediency of management than awareness and concern for the natural resources. By such careful honing of the continuity of your planning units, ironically more land use is encouraged which only create more management problems.

Proponents of the amendment emphasized mining and recreation:

- I totally agree with the BLM recommendation. This area has mineral potential, the extent of which is not totally known.

- We fully support the withdrawal of the WSA designation. We hope all the existing recreational routes of travel in the area will be designated for the continued use they have provided over the past 304 years without detracting from the supposed wilderness potential.

- This change in classification will enhance the feasibility of utilizing the designated utility corridors to the north and east of the Orocopia Mountains.

COMMENTERS

GOVERNMENT

Federal

USDI, Bureau of Reclamation, Lower Colorado River Regional Office
USDI, Fish and Wildlife Service, Sacramento
USDI, National Park Service, Death Valley National Monument
USDI, National park Service, Western Region
U.S. Environmental Protection Agency
Naval Weapons Center, China Lake

State

Department of Parks and Recreation, Anza-Borrego Desert State Park
Resource Agency of California: Department of Fish and Game; Department of Conservation; Office of Historic Preservation

Local

Kern County Planning Department
Riverside County Planning Department
San Bernardino County Land Management Department

Organizations

Audobon Society, Kern County
Audobon Society, Los Angeles
Audobon Society, San Bernardino Valley
Audobon Society, Yuma, AZ
California Association of 4WD Clubs, Inc.
California Native Plant Society, Bristlecone Chapter
California Native Plant Society, San Francisco Bay Area
California Native Plant Society, So. Cal. Conservation Representative
California Off-Road Vehicle Association, Inc., CORVA
Citizens For Mojave National Park
Citizen For Urban Wilderness Areas
Defenders of Wildlife
Desert Tortoise Council
Desert Tortoise Preserve Committee, Inc.
Ecology Center of Southern California
National Parks and Conservation Association
National Resources Defense Council
Voters Circle

Businesses

Gold Fields Mining Corporation
Shield F. Ranch (Dave Fisher)

Utilities

Southern California Edison Company

Individuals

Sidney R. Adelman
Charles Allen
Howard & Harriett Allen
Vernon & Jean Artman
Mary P. Austin
Annemarie Bassett
Robert D. Billings
Michael C. Bondello
Laura Brady
Randy Buford
Peter Burk
Catherine C. Campbell
Harold L. Dittmer
Wena Dows
Mark Dunbar
Dennis Farrant
Warren & Elizabeth Forgey
Robert & Jeanne Foreman
Ruth K. Glunt
Phil Henchehe
Andrew D. Hewchuck
Cynthia Jerman
Mr. & Mrs. Francis L. Johnston
Stephen A. Kaufman
Margaretha Krucher
David Lundin
Betty Matyas
Annelies Nash
Mr. & Mrs. Leo Nowak
Deborah Oles
Cindy Percival
Jacqueline Wolfe Piepke
Mr. & Mrs, Pressburger
Helen Real
Matt F. Reese
Marian E. Reeve
Linda Reifschneider
Steven W. Sharpine
Glenn R. Stewart, Ph.D.
John R. Swanson
Lauralyn Truax
John Unwin
Henriette Van Creveld
Howard G. Wilshire
Lee Wilson
Roger Winter
Glynn G. Wolar
Edward Wynekoop

CHAPTER III

SPECIFIC COMMENTS AND RESPONSES

CHAPTER III

SPECIFIC COMMENTS AND RESPONSES

This chapter presents specific comments made by individuals, organizations and governmental agencies during the EIS public review period and responses to those comments. Many of the comments in the eighty one letters received were opinions favoring or opposing particular amendments. These statements were summarized in Chapter 2. The comments presented in Chapter 3 pose specific questions regarding the EIS itself. They are direct exerpts from the orginal letters rather than summaries.

Table 3-1 lists the comment, the commenter, and the BLM response. Where other commenters raised the same question, they are identified in parentheses. If an EIS textual revision is necessary in response to a comment, that revision is presented in Chapter 4 (Modifications and Corrections).

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	GENERAL COMMENTS	
Margaretha Krucker	Decisions made by the Multiple Use Advisory Council during public hearings should be better observed by the Desert District Manager and BLM staff.	The Desert District Manager and BLM staff agreed with the Multiple Use Advisory Council on all amendments except two which did not meet the criteria stated on page 1-1 of the Draft EIS.
Margaretha Krucker	The Desert District Office should get more open minded in the decisions when dealing with amendments submitted by the public.	The Desert District recommends consideration of all amendment proposals which satisfy the criteria. Many proposals can be accomplished through existing administrative procedures without amending the Plan.
Howard & Harriet Allen	In Public Input on page 5-1, I have had difficulty in identifying replies submitted by individuals which would total 50%, even including two which BLM submitted for two individuals (Smith and Overson) listed on page B-7.	Only part of the respondents actually made amendment proposals. Those who did not were not listed in Appendix B.
Howard & Harriet Allen	In the last paragraph on page 5-1, were only four amendments recommended by the DAC?	Yes, only four amendments submitted by the public were recommended. The rest were deferred, dropped or handled by other administrative procedures. The other 10 amendments which were considered were submitted by the BLM (see page B-8 of DEIS).
Howard & Harriet Allen	In light of Amendment 7 submission from Seabrook, TX (B-8) is it correct to state that Arizona was the only other state represented in responses (5-1)?	Text revised. See correction for page 5-1 on page 4-7.
Howard & Harriet Allen	I would question the figures on charts [on pages] S-4 and 4-36, summary of accumulative impacts: the grazing figures are identical for No Action, even though 26,000 acres would be added under Alternative B of Amendment 10 (p. 4-22).	Text revised. See correction for pages S-4 and 4-36 on page 4-1.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
State of California Resources Agency	The major concern of the Department of Conservation is that BLM refrain from actions that would prohibit access to these lands for mineral exploration. The Department of Fish and Game, on the other hand, recommends several alternatives or amendments that would reduce disturbance to rare or special wildlife and botanical resources. Both departments support the establishment of a procedure to permit compatible mineral exploration on land having such resources. Therefore, the State recommends that the final EIS discuss in detail whether BLM would issue permits for minerals exploration and, if so, what permit conditions would be imposed in order to protect natural resources from adverse project impacts.	Mineral exploration is allowed in Multiple Use Classes L, M, and I and in recommended Class C until Congress reaches a decision on wilderness. Notices of plans of operation must be submitted to the Bureau for other than "casual use" (see DEIS, page 4-9). Stipulations for protection of sensitive natural resources are decided on a case-by-case basis. Issuance of permits for mineral exploration is not planned at this time.
U.S. Environmental Protection Agency	For all areas subject to the amendments, the FEIS should summarize the baseline environmental data on air and water quality. Without such data, it is difficult to assess, from the EIS, the potential adverse impacts generated by such use as grazing, ORVs, and mineral exploration.	The Bureau is associated with the California Desert Air Working Group (CDAWG) and is working with federal, state, local and private organizations to compile and review historical visibility and air quality data in the California Desert. The Bureau is aware of other studies such as the one in progress at China Lake Naval Weapons Center which will determine baseline air quality data in the vicinity of the naval base. The Bureau is also cooperating with the U.S. Geological Survey in their efforts to monitor surface and ground water. Approximately 100 wells throughout the CDCA will be monitored.
	AMENDMENT 1	
CORVA (CA Off-Road Vehicle Association)	The proposed amendment is unnecessary. Cultural, wildlife and botanic values can be controlled with the route designation process in an ACEC Management Plan and total closure is not required. ORV usage is very low and conflicts are minimal. Proper education on the area would enhance the ORV experience and offer a new dimension to the recreationists who use the area.	Nearly one-third of the East Cronese Dry Lake area is private land. Landowners have expressed concern about allowing ORV access across their lands. The area is also within Wilderness Study Area No. 242 and possesses high cultural and wildlife values, as does West Cronese Dry Lake. These factors justify closing these lakes to ORV use.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
CA Assn. of 4WD Clubs	This amendment is not needed and absurd to waste more time on an area already totally "protected." A new route should be proposed around the shore line and above the arch. site line north and south through the area since the Basin Road exit is the only entry into this area for some distance.	Respondent should propose such a route during the route designation process.
CORVA	As for the waterfowl, when the lake has water, ORV's would not be on the lake and could not disrupt the migratory birds. We do not believe that displacing a small number of ORV users is the proper solution and management can be accomplished by means other than closure.	When the lake is dry, closure will protect many cultural sites located along the playa edge. These sites include extensive shell middens. Closure will also protect shoreline vegetation and soil invertebrates which are essential waterfowl habitat features.
	AMENDMENT 2	
CORVA	As stated in the draft, impacts in the past have been minimal because of the low usage. ORV recreationalists are like any other user--some just like to be off by themselves and enjoy a family outing without large crowds. Ibex Dunes would offer an excellent location to fulfill this need.	The purpose of closing the 10% of the dunes which are located on public land is to provide management consistent with that of Death Valley National Monument and keep spill over minimal. The dunes are a continuous system and, as such, should be managed consistently.
	AMENDMENT 3	
CORVA	We would like to inquire as to the importance of the so called archaeological sites. Are they settlement sites or just temporary camps set for one night or when a native American dropped his arrowhead or left behind broken pottery? Significant sites should be protected until they have been researched and documented. But, on the other hand, will anyone take the time to document them?	Many of the sites are campsites representing temporary and long-term use of the area. Also within the subject area are isolated archaeological occurrences where evidence indicates that individuals may have abandoned or discarded some items. Those isolated items are important to understanding the use of the area particularly as it relates to the exploitation of the seasonal resources of the Mojave desert.
Gold Fields Mining Corp.	Recommend No Action Alternative. Access is limited as is. The Providence Mountains east of Devils Playground have high potential Au, Ag, Zn, Pb, Cu.	Access to the Providence Mountains will not be affected by closing the subject area.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
CORVA	Here is an area that is currently Class "L," and by the restrictions in Class "L" can be managed as it is, by proper education of the user. This is a perfect opportunity to make the small amount of "overflow" users aware of the area's resources. The Bureau is in the process of acquiring money via the State ORV Grant process to sign the RASAR (sic) open area and print interpretative brochures. The two could work hand in hand to advise the ORV user.	We agree that it would be worthwhile to print brochures to educate users on the resources in the area and the relationships of the uses occurring in the area. We believe, however, that closure of the Devil's Playground area is necessary in order to protect cultural resources and sensitive wildlife and vegetation from potential damage due to increased use of the Rasor Open Area.
CA Assn. of 4WD Clubs The	The "spillover" is due to the Bureau's misprinting of the map location for the Rasor open area. The Devil's Playground had been a super vehicle recreation area for many years. It has not received substantial use, and due to the sandy soil has not shown the use it has had. There are several routes which show from time to time through the area and thousands of acres where use has occurred in the past. If the arch. sites are critical lets get "sticky" dollars to fence them.	Some of the spillover may be due to ambiguous boundary signing which we intend to correct. However, other spillover could be avoided if users gave more attention to the boundaries shown on the Motorized Vehicle Interim Access Guide for the given area. closure is necessary for the reasons mentioned in the preceding response.
CA Dept. of Fish and Game	Since the Rasor Open Area was established, we have been concerned about impacts of ORV's on the Fort Soda ACEC. This closed area would not only protect wildlife resources and their habitat in the area being closed, but would also serve to protect the resources in the Fort Soda ACEC. To better accomplish the latter, the Department recommends that the closed area be expanded in the northwest all the way to Soda Mountain. As it now stands, there is a corridor approximately one-half mile wide extending from the open area to the ACEC in which "spill over" from the open area can reach the ACEC. The road from Rasor Ranch to Soda Springs which would extend through this closed area could be left open.	The purpose of the closure, other than its protective value, was to establish vehicle use areas that could be clearly signed and understood by the public. Consequently, every effort was made to establish a clearly defined boundary. No attempt was made to address more completely the issue of spillover from Rasor Open Area to the Fort Soda ACEC, since a locked gate and fence prevent access along the one-half mile corridor referred to.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	AMENDMENT 4	
CA Native Plant Society	Questions: Is the language on Land Tenure Adjustment (Desert Plan, P. 17) to be retained? Or does the revision replace it? If the former, only acquisitions would be covered; if the latter, the proposed revision for sales of "Unclassified" lands would not show a requirement to be in accordance to Federal laws and regulations.	The disposal of any public lands, must be in accordance with FLPMA and other applicable federal laws.
CA Native Plant Society	These guidelines do not yet seem to be adequately clear and specific. The intent could be more clearly stated and the protection of any WSAs rejected eventually by Congress should be more specific. All 137 WSAs submitted to Congress (whether suitable or unsuitable to BLM) were the "cream of the crop" of more than 200 originally identified. Any which may be rejected by Congress should be retained under BLM jurisdiction in Class L for their highest and best use next to Wilderness.	The Desert Plan was amended on May 17, 1983, to direct that non-enacted WSAs would immediaely become part of a Plan amendment process to determine their multiple use class designation. In the interim between Congressional rejection and the District Manager's decision, areas would be managed under the "Class L" guidelines.
CA Native Plant Society (also C. Jerman)	Also, the revision adds to existing guidelines the phrase "...or other means." Just what is meant by "other means?"	"Other means" could include donation or gifts of land.
CA Dept. of Fish and Game (Glenn Stewart, C. Jerman, June Latting)	If the amendment is accepted, however, the language concerning "public interest" and "highest and best use" should be included also in the guidelines for class M and I lands.	The requirement that disposal of public land be in the "public interest" and highest and best use" is inherent in FLPMA and other applicable federal laws, which must be followed in the disposal of any public lands.
CA Native Plant Society (also C. Jerman)	Selling Federal lands, merely because they might "more profitably be placed in private ownership" is not in keeping with intent of FLPMA and the Desert Plan, both of which do imply a commitment to retain the land in public ownership.	Lands will not be sold simply because they might "more profitably be placed in private ownership." Lands will be sold only in those cases which comply with FLPMA and all applicable federal laws.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Kern County Planning Department	Changes in Rules and Regulations for sale of public land may impact County Land Use Plans. The proposal needs to detail what specific land ownership changes would be made and BLM management decisions might affect parcels subsequently placed under County Jurisdiction.	At least 60 days prior to offering any land for sale, the governing body with zoning authority or other land use regulatory jurisdiction in the geographic area will be notified. No lands will be offered for sale without coordination with state and local government. The Bureau cannot at this time identify specific parcels to be disposed of. Lands for disposal must meet the criteria contained in Section 203(a) of FLPMA.
CA Dept. of Fish and Game (Cynthia Jerman)	We are also concerned that revising the Desert Plan's Land Tenure Guidelines, as proposed under Amendment 4, may facilitate disposal of public lands without the opportunity for adequate public comment. The current means of land disposal by first changing the multiple-use class (MUC) to "unclassified" by a plan amendment provides the means for securing public comment.	Realty actions are subject to regulations concerning public disclosure and public comment (43 CFR 2711.1-2) which assure that the public will be informed of proposed land disposals and will have ample opportunity to provide input.
Yuma Audubon Society	This amendment would, apparently, allow sale of ACEC lands which is entire unacceptable.	The amendment would not allow the sale of ACEC lands or the disposal of any lands which have significant natural resources. FLPMA and all other appropriate federal laws must be adhered to prior to any disposal.
C. Jerman (Yuma Audubon Society)	Use at time of sale must be consistent with historical use and low intensity management of Class L - what about use if the first private owner then sells to another owner. What is to keep future owner's activities consistent? There do not seem to be any provisions for this.	The Bureau may not impose continuation of historical use of lands after their sale. Control of private property is the responsibility of the city or county with land use authority. Please note that the preferred alternative has been altered to prohibit sales in classes L and I.
Los Angeles Audubon Society	Unlike existing guidelines, the proposed guidelines provide no indication of measures (such as inventory or assessment) which would be taken to prevent land sales from adversely affecting significant resources.	Prior to any land disposal, an assessment of possible environmental impact must be made, based on an inventory of the natural resources. Land disposal would be in conformance with FLPMA and other applicable federal laws.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
State of California Department of Conservation	Without firm established guidelines relating to the sale of public lands, there is no way of determining impacts of such sales upon mineral resources. Until guidelines are established, multiple use would allow for access to areas for exploration and mining activity.	See preceding two responses.
	AMENDMENT 5	
CORVA	There are no rare plants and to say they may exist because they are in nearby areas is like assuming there may be buffalo because someone saw one in Montana or Wyoming in exactly the same type of terrain. To assume is no valid reason to change to Class "L". The area has been determined to be non-suitable for wilderness. Let's be sensible--you cannot lock up everything that is not currently developed for the sake of conservation itself.	As stated in the DEIS, the high occurrence of rare and sensitive plants in the vicinity increases the expectation that they occur here also. Class L would not "lock up" any resources, but would allow review of mining plans of any size prior to surface disturbing activities.
C. Jerman	To end the conflict of whether to accept or reject this amendment, I propose an alternative - make this area an ACEC - it would protect water quality, waterfowl, and wildlife - including endangered species, and rare plants. The uniqueness of the species of whip scorpion, along with the above reasons, is good reason to create an ACEC here.	Designation of an ACEC has not been proposed. Development and implementation of a habitat management plan was judged to be sufficient protection during preparation of the Desert Plan.
	AMENDMENT 6	
Southern California Edison Company	We have concern regarding the close proximity of the Creosote Rings ACEC (MUC "L"-proposed) boundary to the California Energy Commission approved route for a water supply line to this Company's "Solar 100 project." The route is parallel with and adjacent to Bessemer Mine Road. We, therefore, request that the ACEC boundary be established so as to insure that the water supply line route is not included within the ACEC.	The boundary of the ACEC was set during preparation of the Desert Plan. Possible adjustments to the boundaries will be considered when the right-of-way for the proposed water supply line is considered.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
CORVA	Creosote Rings ACEC: Vehicle use is restricted to public roads under present guidelines. Changing to Class "L" would not change this at all. Unrestricted "free-play" is not allowed where travel is allowed on public roads 'only'. Interpretative signs can handle any problems for few who may not understand.	Class L designation indicates a long-term commitment by the Bureau to manage these lands for protection of creosote rings. Continuation of "unclassified" status would leave open the possibility of land sales in this sensitive area.
	AMENDMENT 7	
California Dept. of Fish and Game (Yuma Audubon Society) (Glenn R. Stewart), (Desert Tortoise Council)	However, we recommend that Alternative A be amended to change the designation of the land status within the ACEC from Unclassified to Class L. This change would reflect the values placed on the ACEC's habitat by the BLM.	The Bureau agrees with the concept that unclassified lands are not appropriate for ACECs. The Bureau has considered changing the unclassified portions of the area to Class M. This would bring the subject area into conformance with the surrounding area, which is Class M. A spot zoning of Class L was not advisable in this Class M area.
Desert Tortoise Council	This amendment is inconsistent with Amendment 6 in that it proposes establishing an ACEC on unclassified land. Amendment 6 presents persuasive arguments supporting the concept that ACECs on "unclassified" land represent conflicts in BLM's commitment for long-term management of these lands.	Please see preceding response.
CORVA	Creating a new ACEC will not solve the problem of visitors or poachers removing cacti from the desert, because it is presently illegal to remove live plants from public lands under Federal control. Just because the area is designated an ACEC will not stop people from removing plants.	Similarly, an ACEC is not required to provide protection (e.g., fencing) for sensitive resources. Since the Sclerocactus can and will be protected without the requirement of designating an ACEC, the preferred alternative has been changed to reject this amendment.
	AMENDMENT 8	
CORVA	CORVA asks the Bureau to reject the amendment for the same reasons as Amendment #7.	The ACEC management plan will identify methods for protecting cultural artifacts and discouraging removal of artifacts.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Southern CA Edison Company	We request that adjustments be made in the northern boundary to accommodate our existing Devers-Palo Verde (No. 1) 500 kV T/L and access roads. To minimize any possible interference, there should be a setback or buffer area (minimum of 400 feet) between the southerly edge of the existing right of way and the northern boundary of the proposed ACEC.	The existing 500 kV power line and access road are compatible with the ACEC. A buffer area is not necessary.
CA Assn. of 4WD Clubs	This is not a small significant section to be preserved. Twelve square miles is too excessive! The sites themselves can and probably should be kept for study, but the area has been used for years for refcreation. There is no reason to lose so much land to "preservation" when the sites don't take up that much area!	The goal of the ACEC management plan will be to protect cultural resources without unduly restricting current use. The plan will identify locations where camping should be allowed or restricted as well as areas where fencing will be required. Following further inventory, boundaries will be reassessed, and size reduction will be considered.
	How much "damage" will occur due to the added notoriety the ACEC will give the area? "Class L" continued designation could do just fine to "protect" the area. If the sites are critical, fencing could provide the needed deterent without unduly restricting the normal camping and other recreation uses that have taken place there since General Patton left.	"No Action," or continued management under Class L guidelines will permit continued destruction of archaeological sites. Most destruction is caused by camping and other present uses allowable in Class L. Some disturbance is deliberate theft and vandalism. A class II cultural survey will provide knowledge of the location of cultural sites which can then be protected.
CA Dept. of Fish and Game	However, access to various big game wildlife drinkers and natural tanks located in the adjacent Chuckwalla Mountains must not be affected. The road from Interstate 10 to the base of the mountains needs to remain open to provide Departmental personnel and equipment access for water facility inspection and maintenance and wildlife management activities.	Access will be provided for maintenance of wildlife and other essential facilitiew in the Chuckwalla Mountains. Access through the ACEC will be addressed specifically in the ACEC management plan.
	AMENDMENT 9	
C. Jerman	If Alternative B is reconsidered after an AMP is developed, including a monitoring system, the S.W. half of the proposed allotment in this amendment should be omitted to protect crucial desert tortoise habitat.	Your concern will be taken into consideration during preparation of the AMP (Allotment Management Plan) in FY85. Any conflicts between tortoises and livestock within the highly crucial tortoise area will be mitigated to avoid damage to tortoise habitat.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
C. Jerman	On p. 4-18, the 1st paragraph discussing livestock grazing, states the estimated carrying capacity would be 1500 AUMs. In the 2nd paragraph it states that carrying capacity is to be determined during AMP development - which is correct?	Both are correct. The actual carrying capacity will be determined when the AMP is prepared. The first figure, 1500 AUMs, was estimated by a local range conservationist familiar with this allotment and with the carrying capacity on a similar range.
China Lake Naval Weapons Center	Of particular concern to the Center, if Amendment #9 is adopted, would be the increased potential for cattle trespass on the Center. The Center is reintroducing Bighorn Sheep this winter nto the Eagle Crags which border the Pilot Knob Allotment. If the cattle came into contact with Bighorn Sheep, they could accidentally transmit disease into the herd, threatening its survival. Fencing the boundary between the Center and adjacent BLM lands in this area appears to be the only viable mitigation.	The Bureau is currently collaborating with the Naval Weapons Center on fencing the eastern boundary of the Pilot Knob allotment to restrict livestock movement onto the lease. Construction of this fence should prevent interaction between livestock and desert bighorn.
CA Dept. of Fish and Game	Any further grazing allotment expansion would serve to adversely affect not only desert tortoise and the rare Mohave ground squirrel but the desert bighorn sheep population on Pilot Knob by competition for forage and water and potetial disease introduction from livestock (reference: Blong and Pollard, 1968; Payson and Turner, 1977; and Foreyt and Jessup, 1982). Environmental degradation caused by excessive livestock grazing should be avoided.	The proposal is not to expand the allotment, but rather to convert the allotment from ephemeral to ephemeral/perennial allocation. The current allotment no longer includes any lands at Pilot Knob, which is now within the Mojave B Range of the Naval Weapons Center. Separation of livestock from desert bighorn on the Mojave B Range was discussed in the preceding response.
Natural Resources Defense Council	Similarly, given the resources of the Pilot Knob area and the impacts of grazing thereon, we frankly do not understand the basis for the Bureau's optimistic assertion that "a perennial allotment could be reconsidered after development of an AMP..." P. 2-6. Exactly how and when does the BLM expect to obtain "the knowledge and facilities necessary to manage" the "conflicts with wildlife" which will occur from year-round grazing in the allotment?	Our present information was obtained from historical usage, recent temporary usage, and field observation by professional range conservationists. Additional knowledge, obtained during preparation of the AMP in FY85, should permit re-consideration of a perennial allotment. Funding of range improvement facilities to avoid conflict between livestock and wildlife will be determined if, or when, any increase in grazing is considered.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	AMENDMENT 10	
CA Native Plant Society	The primary target of impact in this massive expansion is not even mentioned. Under "Environmental Consequences", a search for disdiscusion of the plants to be grazed by the cattle yields nothing, other than the above reference to "suitable only for ephemeral usage" and a few others to "forage" - either "perennial", "ephemeral" or "available". There is no species list; no mention of presence or absence of rare plants; no mention of plant communities, their abundance, diversity, composition; no discussion of impacts upon species or vegetation; no mention of range condition. The only indication that range condition would be considered is the statement: "Carrying capacity would be determined at the time of AMP development as described for #9, Altrnative A." Such data should be obtained prior to a decision on any grazing amendment.	Vegetation in the expansion area of the preferred Alternative B is similar to that in the Cronese Grazing Allotment, which was described in the Allotment Management Plan that was published in March, 1983 (available in the California Desert District Office and the Barstow Area Office.) (Text has been revised, see p. 4-1. Two plant assemblages are present within the expansion area. They are creosote bush scrub and desert grassland. No federal or state listed rare, threatened, or endangered species have been reported in the expansion area. Species recognized as "rare in California" by the California Native Plant Society are found in the present allotment (Androstephium breviflorum) and in the expansion area south of the existing allotment in Alternative C (Linanthus arenicola). None are found in the expansion area of the preferred alternative. Under the preferred alternative, forage conditions would be checked yearly for availability of ephemeral grass species and annual forbs.
	AMENDMENT 11	
CA Dept. of Fish and Game	The expansion of the grazing allotment, as proposed in the amendment under either Alternative A or B, would result in long-term impacts to biological resources. There is a very little available forage in the Rodman Mountains. Also, nearby areas may be sites for reintroduction of bighorn sheep. We believe large scale negative impacts to wildlife and habitat should not be allowed for the sake of expanding livestock grazing within desert ranges. Additionally, livestock drifting into closed grazing areas would be difficult to control unless stringent measures are required of the operator and followed up with effective enforcement by the BLM.	The impact analysis for this amendment has been revised following additional field investigation. Please see the appropriate portion of Chapter 4.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Natural Resources	Amendment 11 proposes to expand the Ord Mountain Allotment. One of the alternatives would include the Rodman Mountains. Inclusion of the Rodman Mountains is considered even thogh their outstanding archaeological resources "led to the rejection of the proposed Rodman Mountains allotment by the Desert Plan" and [s]tudies dones since then indicate that this area is even more sensitive than previously thought." p. 4-24. The Bureau's proposed rejection of both alternatives comtemplated by Amendment 11 does not in our minds justify consideration of the amendment. It should have been rejected outright when first proposed. Indeed, we understand that a relict population of bighorns was just discovered in the Newberry Mountains adjacent to the Ord lease and believe that no changes should be made in that lease until more is known about this new population.	See preceding response.
	AMENDMENT 12	
C. Jerman	You do not mention your legal commitment to protect burros under the Wild Horse & Burros Act, nor do you discuss alternatives of a range improvement and water development program which could make their maintenance feasible. You also do not discuss how the burros will be removed and what will become of them after removal.	These matters are discussed in Chapter 3 of the Desert Plan pp. 59-66, the section on the Wild Horse and Burro Element. They are referred to in Chapter III of the Draft EIS, P 3-3.
C. Jerman	If you eliminate burros in this area and burros in the other areas, (W8, W4, W10, Darwin Falls ACEC), where in the 17 areas will they be protected? Where will you keep the law according to the Wild Horse and Burro Act? What will be the next area slated for burro elimination? In how many areas will they be removed?	In December, 1980, the Desert Plan identified 22 Herd Management Areas (HMAs) in the CDCA. If this amendment is approved, 11 burro HMAs and 7 horse HMAs will remain. No other HMAs are being considered for elimination. Horses and burros will be protected as an integral part of the public land resources. All HMAs are involved in burro capture and removal for live adoption to maintain appropriate population levels.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
C. Jerman	You refer to the conflict between burros and bighorn. Perhaps you should analyze research data done by Wells and Wells for the National Parks Service in The Bighorn of Death Valley. Comments - Wells & Wells Research: p.xv - "it cannot be argued that the burro is eliminating the bighorn, since healthy herds of both species are thriving together on some ranges and have done so for years." p. 49 - "Burros and bighorn will and do water at the same spring." p. 160 - "The incredible mass of misinformation about the wild burro that has been accumulated and disseminated through highly respected channels was initially the result of misreading of signs at waterholes." P. 178 - "We have found no evidence to support the claims that burros foul and trample waterholes rendering them unsuitable for bighorn."	The basis for the amendment is not bighorn sheep, but cooperative management. Maintaining of burros in this area would not be consistent with Death Valley National Monument and China Lake Naval Weapons Center objectives. Furthermore, there is substantial data contradicting Wells and Wells (as quoted). We believe the amendment will be highly beneficial to wildlife in this area.
	AMENDMENT 13	
U.S. Environmental Protection Agency	It is unclear from the DEIS exactly what effects this change will have on BLM's wilderness recommendations to Congress. The net effect of this amendment seems to be that this area will no longer be classified as "suitable for wilderness" and therefore will not be eligible for future designation as a wilderness. The FEIS should clarify whether this is the final deletion of this area from further wilderness consideration. If this area will no longer be considered a "202 wilderness", then the FEIS should provide substantially more information about the basis for this decision and the likely environmental consequences. The FEIS should describe what criteria are used for evaluating a "202" wilderness" and how this particular area was evaluated.	Under the "No Action" alternative, if the Secretary's order is upheld, the former WSA would continue to be recommended as suitable for wilderness designation under Section 202 of FLPMA. Section 202 does not provide the "nonimpairment protection," of Section 603 for WSAs. While under litigation, the Bureau will continue to apply the nonimpairment standard. This area was studied under Section 603 of FLPMA and was found to meet the statutory criteria for wilderness areas.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
U.S. Environmental Protection Agency (also C. Jerman)	The FEIS should discuss which one of the alternatives BLM considers environmentally preferable and provide the rationale. In particular, more information should be provided about the policies and management plans currently in effect for this area. The 'no action' alterseems to be the environmentally preferable alternative because the current plans act like a defacto wilderness designation.	The Bureau will identify and discuss the environmentally preferable alternative in the Record of Decision as required by C.E.O. regulations (40 CFR Part 1505.2). The requirement to address this matter in the EIS was deleted by the council prior to promulgation of the regulations in November, 1978 (43 FR Nov. 29, 1978, p. 55984).
CA Native Plant Society (Natural Resources Defense Council) (Riverside County Planning Dept.) (Peter Buck)	BLM's stated reason for these proposed amendments is that both of these WSAs were dropped from WSA status due to "split estate mineral rights" according to an order on 12/30/82 by the Secretary of Interior under authority of an Interior Board of Land Appeals ruling (page 2-9). However, as BLM is aware, a lawsuit was filed in January 1983 protesting the Secretary's ruling. On 9/9/83, Federal Judge Karlton ruled that the Secretary's action violated FLPMA and NEPA and issued a preliminary injunction effectively setting aside the Secretary's order of 12/30/82. The affected WSAs therefore should have been reinstated as WSAs, as well as any other WSAs which were affected by the Secretary's order of 12/30/82. The proposed amendments are no longer appropriate or valid and should be dropped from consideration.	The preliminary injunction issued by Judge Karlton prohibits the authorization of any impairing activity in "former WSAs" due to a split-mineral estate condition. However, the changing of a preliminary recommendation regarding wilderness suitability does not, of itself, impair, or allow impairment of, wilderness values. It is the intention of the Bureau to continue to process plan amendments 13 and 14 as described in the DEIS and to make preliminary decisions regarding the appropriate land use designations for the areas. If the litigation is settled in favor of the Department of Interior, or if no decision has been announced by the time the Record of Decision is signed, the amendment will approved. If the court voids the Secretarial Order, it may become necessary to reconsider the preliminary decision. Following the above course of action is considered appropriate and expedient, because to stop at this point of the amendment process would require a repetitious and wasteful reconsideration of the issues in another Plan amendment EIS.
National Parks and Conservation Assn.	We question whether the Santa Rosa Mountains should really no longer be considered worthy of wilderness status. Here in Arizona, the BLM is currently working aggressively to work out split estate exchanges so that a couple of particularly deserving areas can again be considered for addition to the wilderness system.	See preceding response.

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	Whether or not the Santa Rosas are suitable for wilderness designation (considering such factors as wildlife management needs), it would appear desirable to resolve the split estate issue there, even though mineral potential seems minimal and mining companies seem "disinterested."	
C. Jerman	If, when designated as wilderness, S. Pacific would retain rights to surface entry and Class L would be more consistent with management problems this could create, then change to Class L and create an ACEC at that time - why jump the gun? Alternative C is preferred, this amendment should be rejected. Keep this area as Class C.	See preceding response.
Riverside County Planning Dept.	The technical Appendix A Santa Rosa Mountains locational map legend needs to be corrected. Alternative A is lacking the ACEC designation, while Alternative B has the ACEC designation.	The map has been corrected. See p. 4.9.
Riverside County Planning Dept.	The draft EIS needs to assess and discuss at a regional level, what effects and impacts would occur on the natural and physical resources that exist in the region because of the removal of the WSA status from the Santa Rosa Mountains. This is especially important, in light of both recent legislation and another Federal Agency's (San Bernardino National Forest) interest in increasing the size of the existing San Jacinto Wilderness and the proximity of the Santa Rosa Mountains to those lands. Resources that need to be assessed include but [are] not limited to the range and habitat needs of the Peninsular Bighorn Sheep, Golden Eagles, Prairie Falcons, and archaeological sites.	The cultural and wildlife resources are addressed in the DEIS. The regional significance of these areas to bighorn sheep and desert slender salamander are addressed. Specific impacts on wildlife species cannot be stated because any specific changes in land use, if any, are unknown.
Southern California Edison Company	The Santa Rosa Mountains (Martinez Canyon area) provides the most realistic alternate transmission line corridor between the eastern low desert areas and the Perry Valley region. The only corridor now available is through the San Gorgonio Pass.	The utility element of the Desert Plan does not include a corridor through the Santa Rosa Mountains. The route was rejected several years ago in the Kaeparowitz Project due to wildlife values, primitive values and very rugged terrain. Since that

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
	We do not have any current plans for a transmission line crossing through the Martinez Canyon area, but the availability of a possible second corridor between the low desert and Perris Valley would provide a practical means of meeting the future energy requirements of Southern California.	time some of the area has been transferred to Anza Borrego Desert State Park, leaving only a narrow rugged corridor of checkerboard pattern BLM lands. The Bureau does not view this route as a feasible alternative to San Gorgonio Pass.
U.S. Environmental Protection Agency	The document should discuss the existing resources in the area; the DEIS provided no information about the current air and water quality. Impacts to water quality, protected and beneficial uses, and air quality may be significantly different under wilderness versus nonwilderness management. The FEIS should clearly compare the likely environmental impacts of management under the existing plans versus a change to Class L, ACEC.	Impacts to air and water quality will be minimal because of the change to Class L. Water quality could be impacted with increased mining operations, but mining activities will be managed through the 3809 regulations to prevent undue and unnecessary degradation of water resources.
Riverside County Planning Department	Presently, there is legislation sponsored by Burton, Cranston, and Wilson that would add land to the already existing San Jacinto Wilderness Area. This land borders the Santa Rosa Mountains. The draft EIS needs to assess and discuss the effects and impacts that would occur to this legislation in the light of the Santa Rosa Mountains losing their WSA status. The draft EIS needs to assess and discuss the current round of San Bernardino National Forest Rare II, along with what effects and impacts may occur to this land under Rare II consideration if the Santa Rosa Mountains lose their WSA status. Presently, the San Bernardino National Forest Rare II process is considering several areas adjacent to the Santa Rosa Mountains WSA for wilderness designation. Those areas under consideration include but [are] not limited to Spitler Peak (05190) 7,100 acres, Pyramid Peak (A5189) 19,500 acres, and Pyramid Peak (B5189) 8,800 acres.	The referenced legislation does not include wilderness recommendations for any lands administered by the Bureau of Land Management. We feel that wilderness values present on the Forest Service lands addressed in the legislations can stand on their own merits and do not require the contiguity of BLM wilderess to meet the requirements of designated wilderness. It is true, however, that adjacent wilderness can complement the manageability and extent of wilderness opportunities for both units. We have added to the text for Amendment 13. (See p. 4-7).

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
Randy Buford (CA Dept. of Fish and Game)	It is absurd for the presence of some 7700 acres of split estate land in the southeast corner of the area to mean that the entire 68,051 acres cannot remain Class C. The removal of less than 15,000 acrs from the southeast corner of this area would still leave over 53,000 acres (according to your map) of non-split estate land in one solid block. In view of the minimal GEM potential and tremendous values demanding Class C protection, there should not even need to be any discussion over the bulk of this area remaining under the highest possible level of protection, and the southeast 15,000 acres should be managed as Class C until the split rights can be recovered.	See Chapter II, Supplementary Information, p. 2-9 in the DEIS. After split estate lands are removed, less than 5,000 acres of contiguous public lands remain. Checkerboard sections do not have common boundaries, so are not contiguous. The area, therefore, fails to meet the legal requirement for a WSA. Please see map, p. 4-9.
C. Jerman	This seems to be another give away to the GEM program yet you state mineral potential is considered low and there is little interest at this time - so why not leave the area as Class C if impacts from mining are expected to be low? You state that mining won't impair wilderness suitability unless mining claims filed (under Alternative A) exceed what is anticipated - a big if, and what then? You also state that mining is the greatest threat and that even a small operation would have a significant effect on the bighorn, and that impacts in most cases could not be fully mitigated. It is also stated that Alternative A wouldn't provide protection from non-discretionary actions such as locatable mining, nor provide the same priority to land acquisition as would wilderness designation.	The Santa Rosa Mountains are not expected to receive mining or energy exploration or development to any appreciable degree, based upon a current lack of claims, operations, or historic production. While wilderness designation would indeed provide the highest degree of protection for the area, the limited uses allowed within Class L, plus the additional environmental safeguards of the existing Habitat Management Plan, are expected to provide adequate protection to the Peninsular Bighorn Sheep. Land acquisition in the area has been, and continues to be, a priority to the Bureau, and ongoing efforts have already resulted in the acquisition of several sections of land by government agencies.
	AMENDMENT 14	
Riverside County Planning Dept.	One page 4-35, the second to the last line in the second paragraph, the word "ifiting'" (SIC) should be changed to read lifting. Additionally, this sentence should be re-worded to read either "..., the Orocopia Mountains are speculated to have high mineral potential" or "..., the Orocopia Mountains have been speculated to have high mineral potential."	The sentence in question intends to state that the possibility of gold deposits denotes speculative mineral potential, while the presence of talc in potentially economic quantities denotes high mineral potential. The rewording you suggest would change the meaning of the sentence. The text has been revised to correct typo on "lifting." (see p. 4-7).

TABLE 3-1
SPECIFIC COMMENTS AND RESPONSES

COMMENTER	COMMENT	RESPONSE
C. Jerman	You state that a change to Class L would allow resolution of conflicts between the bighorn and recreationists, but you do not state what these conflicts are.	The conflicts refer to disturbance of bighorn sheep by motorized vehicles, especially near water sources. Specifically, in Class L some routes may be designated "closed" to lessen disturbance of bighorn sheep.
U.S. Environmental Protection Agency	The document should discuss the existing resources in the area; the DEIS provided no information about the current air and water quality. quality may be significantly different under wilderness versus nonwilderness management, especially since there is no proposal to designate the area as an ACEC. The FEIS should clearly compare the likely environmental impacts of management under the existing plans versus a change to Class L.	Impacts to air and water quality will be minimal because of the change to Class L. Water quality could be impacted with increased mining operations, but mining activities will be managed through the 3809 regulations to prevent undue and unnecessary degradation of water resources.
Desert Tortoise Council (U.S. Environmental Protection Agency)	The Council feels that best protection can be afforded the Orocopia Mountains by recommending them as suitable wilderness under Section 202 of FLPMA. It seems a serious oversight of the draft EIS that this was not included as an alternative. It is not clear exactly what will take place if the amendment is rejected. Will it be recommended as a 202 Wilderness Area or will some other action occur? The final EIS should clarify this action.	Under the "No Action" Alternative, the former WSA would be recommended as suitable wilderness under Section 202 of FLPMA. Please see also response to first comment on Amendment 13.

CHAPTER IV

MODIFICATIONS AND CORRECTIONS

CHAPTER IV

MODIFICATIONS AND CORRECTION

Summary, p. S-3. Change title of table from Table S-2 to Table S-1.

Summary, p. S-4, Table S-2 and Chapter 4, p. 4-36, Table 4-1. Change acres in ephemeral allotments for the preferred alternative from 1,619,879 to 1,645,879.

Chapter 2, p. 2-2, Amendment 1: Change Proponent's Reason for Submission to read: "The Cronese Lakes are sensitive because of wildlife habitat and because of many cultural sites located along the shoreline. (East Cronese Lake is an ACEC; both are Class L)."

Chapter 2, p. 2-3, Amendment 4. Change Proponents Reason for Submission to read: "Need to clarify Land Tenure Adjustment and Land Sale Program in MUC classes, including disposal of public land by sale.

Chapter 2, p. 2-3, Amendment 4: Change second sentence of Rationale for Selection to read: "Proposed guidelines would [complement other asset management and tenure adjustment tools] complement other methods for land sale and tenure adjustment (such as exchanges and Recreation and Public Purposes applications) already detailed in Land Tenure Element."

Chapter 2, p. 2-4. Amendment 5. Revise Proponent's Reason for Submission to read:

A thermal cave which contains several species of endemic cave vertebrates is located in this area. Alteration of this cave environment would probably result in their extinction. The area also contains a portion of the Amargosa River drainage which flows into the Grimshaw Lake and Amargosa ACECs. Reduction in water flow or quality could have a serious impact on many rare forms of wildlife and associated wetland habitats present within these ACECs. A change in class from "moderate" to "limited" is warranted as a protective measure for these sensitive biological resources. The area in question does not have high mineral potential, and a class change would not preclude the opportunity for mineral exploration and development here. It would provide, however, far more time to carefully review mining measures, contact and consult with other wildlife agencies, and develop protective mitigation measures to reduce or eliminate adverse affects.

Chapter 2, p. 2-7, Amendment 11: Revise the Description of Amendment to read: Enlarge Ord Mountain Allotment (ephemeral/perennial) to include acquired SP land surrounding present allotment. Consider three alternatives:

Chapter 2, p. 2-7, Amendment 11: Revise the last sentence in Rationale For Selection of Preferred Alternative to read: "In addition, the southern portion of this area is within the Johnson Valley Open Area."

Chapter 3, p. 3-3, Amendment 10: Add to list of references: Cadiz Mountains/Cronese Lake Allotment Management Plan, 3/31/83.

Chapter 4, p. 4-24, Amendment 11. Replace sections on cultural resources and wildlife for Alternative A analysis with the following:

Cultural Resources

More than 30 known sites are scattered throughout the proposed extension. Most sites are confined to lava flows within the Rodman Mountains. The area includes a 3,200 acre Archaeological District listed on the National Register of Historic Places. Cultural resources include petroglyphs, rock rings, rock alignments, artifactual materials, shelter caves, and camps.

Some of the archaeological sites on lava could be damaged by foot traffic or livestock. Many sites are on vertical rock faces or rugged terrain. Neither of these areas are likely to receive any disturbance by livestock, which will seek more desirable grazing sites. Two major cultural site areas have been fenced already. Many sites are located around natural water sources. Cultural resources will take priority over grazing activities, so some sites may be determined to require further mitigation (i.e., fencing) to prevent impact by cattle.

Mitigation methods for protection of cultural resources will be identified in the AMP. Proper water development (in non-sensitive areas) and appropriate stocking levels should facilitate cattle control and almost eliminate adverse impacts. Further mitigation methods will be developed on a site-specific basis as needed.

Wildlife

Approximately 50 percent of the proposed extension is within the Newberry/Granite Mountain Raptor Breeding Area designated for protective management. Nesting species include Golden Eagles, Prairie Falcons, American Kestrels, and Great Horned Owls. Primary eyrie concentrations are near Sheep Spring, a major water source, though with limited flow. Other existng water sources include two natural rock tanks in the north central portion of the extension and two small-game guzzlers constructed by the California Department of Fish and Game to provide additional water for chukar, mourning doves, cottontails and other wildlife species. During wet years, temporary seeps form, and small rock tanks collect rainfall runoff, thus supplementing th water supply for wildlife.

The desert tortoise, a state protected species currently under federal status review, occurs in portions of the southcentral and northeastern areas of the extension. Densities vary from low (0 to 20 per square mile) to moderate (50 to 100). The northwestern portion of the extension may be within the range of a remnant desert bighorn sheep population. Until recently, bighorn sheep had not been observed in this vicinity since 1966. During an aerial mineral survey in the fall of 1983, approximately 17 sheep were sighted in the Newberry Mountains. The reported sightings were several miles northwest of the extension. It is believed bighorn use of the area is intermittent. Herd size, distribution, migratory patterns, and water sources are not known at this time.

Expanding livestock grazing into a new area may cause direct and indirect impacts upon wildlife habitat. The degree of impact is related to grazing intensity. Heavy utilization reduces plant biomass, lowers the diversity of annual forbs and grasses, and changes the plant community composition. Concentrated use and habitat degradation results in severe forage competition between livestock and wildlife such as desert tortoises and raptor prey species like rodents and rabbits. Grazing impacts on desert bighorn include competition for food and water. Direct competition for food is usually low due to different preferences and movement. Water is probably the greatest limiting factor.

Overall, impacts are dependent upon such factors as grazing intensity, distribution patterns, and forage quantity and condition. Proper determination of carrying capacity, moderate stocking rates, proper distribution, and forage allocation for wildlife will minimize competition between livestock and wildlife and allow joint use of resources without significant degradation.

Chapter 4, p. 4-25, Amendment 11. Paragraphs 2 is revised to read:

~~Extending a grazing allotment into a WSA, where cultural sensitivity is high near natural water source, has the potential to cause local loss of resource values.~~ ~~Half~~ approximately one-third of the proposed expansion area is within the Rodman Mountains WSA, which is recommended suitable for wilderness designation. The IMP allows the establishment or extension of grazing in a WSA, as long as specific activities do not impair the area's suitability for wilderness. When developed, the allotment management plan would protect sensitive resources through appropriate mitigation measures prior to approval of grazing operations. Particular attention would be paid to water developments and distribution systems to insure that they do not impair the area's cultural and wildlife wilderness values. In the interim priod, forage will be allocated yearly on a temporary non-renewable basis. After designation, preference will be authorized on a permanent basis.

Chapter 4, p. 4-25, Amendment 11. Add a new section on recreation and a revised section on livestock grazing for Alternative A analysis.

Recreation

Recreational opportunities within the extension area include hiking, sightseeing, nature study, and chukar hunting. The southern portion of the extension is within the upper Johnson Valley ORV Open Area and is currently used for free play and competitive events.

Livestock may be visible in areas visited by recreationists. However, small groups of cattle, widely dispersed, should have no significant impact on recreationists. Existing use of the Open Area by off-road vehicles will continue to take priority. The livestock operator will be responsible for contacting BLM to determine race dates in the Open Area to allow for livestock safety.

Livestock Grazing

This ephemeral/perennial extension, which contains 48,640 acres of public land, would allow the operator of the lease to utilize his railroad private land leases. The area of extension would also include 18,560 acres of the proposed Johnson Valley Grazing Allotment, which was to be leased as an ephemeral sheep lease. The eastern expansion of the Ord Mountain Allotment end of p. 4-4 would give the rancher an eastern boundary adjacent to the Twentynine Palms Marine Base. The operator will assume full responsibility for livestock drifting into potentially hazardous areas on the base. This extension will include perennial forage AUMs to add to the allotment's carrying capacity and some ephemeral range. ~~Water would not be a problem~~, ~~since two sources are available within the extension~~.

Carrying capacity and forage allocation will be determined at the time of AMP development as described for amendment, nine Alternative A. No leasing will occur in the new area until the AMP is developed. Forage allocation within the WSA must be issued yearly on a temporary non-renewable basis until the wilderness designation is determined by Congress. At that time, permanent preference may be assigned and reflected in the AMP. Based on ocular reconnaissance, sufficient forage is available to support a perennial allocation which would not result in overutilization of available forage (see Figure 4).

~~Since part of the extension lies within the Rodman Mountains WSA~~, ~~preference would not be allocated until after Congress decides on the status of the WSA. Until that time~~, ~~AUMs would be allocated on a temporary, non-renewable basis~~. A diverse perennial base of grasses and shrubs should provide more than adequate feed for moderate stocking. Further studies are scheduled to determine actual carrying capacity.

Grazing is a useful tool in vegetation management. Moderate grazing removes excess vegetation and reduces fire hazard, while encouraging new plant growth and increasing vigor. Livestock movement also provides nutrient recycling.

Overall, few improvements are necessary to make this alternative feasible. Water would not be a major problem during the wet season, and a new well would be planned in the eastern side of the extension to aid in proper distribution during the dry months. If drift is later determined to be a problem, the need for fencing will be determined based on existing natural barriers.

Chapter 4, p. 4-26, Amendment 11. Revise the paragraph on livestock grazing as follows:

Approximately 17,000 acres of the proposed expansion, including WSA 207 and the sensitive wildlife and archaeological values of the Rodman Mountains, would be excluded from the extension. Since no part of the WSA would be included in the extension, there would be no delay in granting preference.

Nearly as much forage would be available to livestock as in Alternative A since the remaining acres include the majority of the available perennial AUMs. Some fencing may be required (at approximately $2,000 per mile) to extend natural barriers to keep livestock out of the excluded area. However, based on livestock behavior, it is not likely cattle will climb or move across the rocky, broken terrain of the sensitive areas. Fencing requirements will be determined when the AMP is done, in FY84.

Chapter 4, p. 4-26, Amendment 11: Add new Alternative C analysis and change "No Action" to Alternative D.

Alternative C: Modified Expansion B

Cultural Resources

Few known sites occur in this area; therefore, impacts would be minimal. Most of the area of high site concentration, as well as most of the National Register District, has been excluded from the expansion area. The Bureau will work with the Advisory Council on Historic Preservation to ensure that impacts on those sites remaining in the expansion area are avoided.

Wildlife

Although several thousand more acres of the Rodman Mountains will be included in the expansion area than under Alternative B, the expansion area will not include Sheep Spring, the game guzzler, the large natural rock tank, or any of the historical raptor eyries. However, the pocket of relatively high Desert Tortoise densities (50 to 100 per square mile) would remain within the expansion area. Accordingly, the level of impact would be similar to that expected under Alternative B and lower than those which would occur under Alternative A.

Livestock Grazing

Approximately 17,000 acres of the proposed expansion would be excluded from the extension. However, nearly as much forage would be available to livestock as in Alternative A since the remaining area includes the majority of the available perennial AUMs. Several miles of fencing (at $2,000 a mile) would be required to extend natural barriers to keep livestock out of the excluded area. Since part of the extension lies within the Rodman Mountains WSA, preference would not be allocated until after Congress decides on the status of the WSA. Until that time, AUMs within the WSA would be allocated on a temporary, non-renewable basis.

Chapter 4, p. 4-26, Amendment 11. Revise second sentence of last paragraph to read: "While fencing and development of additional water sources might result from livestock use in this area, these positive actions would be ~~more than~~ offset by the negative effects due to competition.

Chapter 4, p. 4-27, revise the second paragraph as follows:

Under this alternative, the operator would not be able to use his private lease lands, nor could he increase his herd size. Although he would lose these opportunities to expand, his existing operation would be unaffected. ~~Some drift problems would remain on the eastern boundary until fencing was built~~.

Chapter 4, p. 4-30, Amendment 13. Add a second paragraph to Wilderness section: "The Cactus Spring RARE II unit is adjacent to former WSA # 341, Santa Rosa Mountains, and a suitability determination will be made in 1985 as part of the San Bernardino National Forest Plan."

Chapter 4, p. 4-33, last paragraph. Change "poplar" to "popular."

Chapter 4, p. 4-35, third paragraph, last sentence. Change "lfiting" to "lifting."

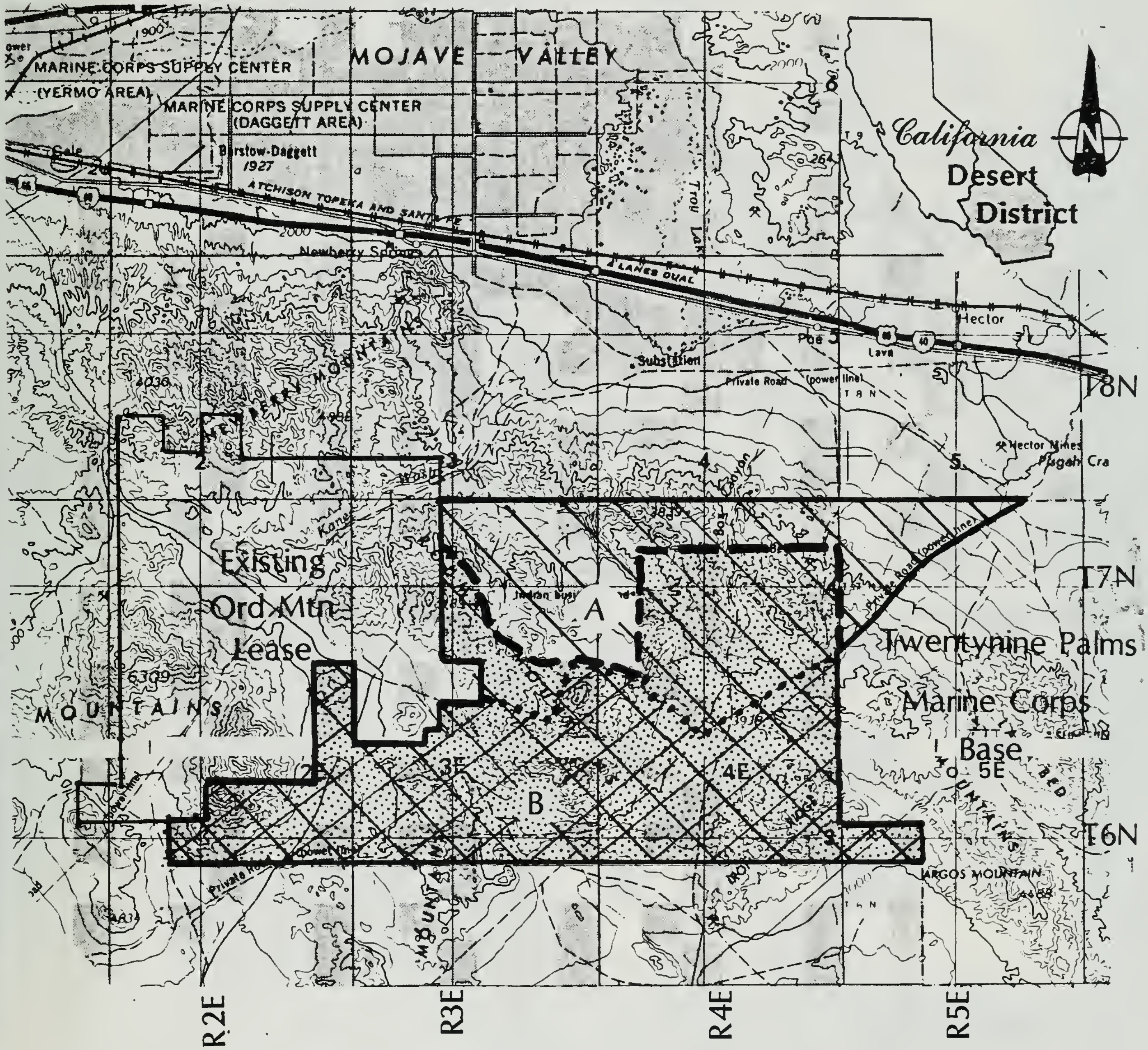
Chapter 5, p. 5-1, paragraph 4. Change last sentence to "Arizona and Texas were the only other states represented."

Amendment 11
Ord Mtn Grazing Allotment

▧ Alt.A
Expansion (East)

▨ Alt.B
Modified expansion (East)

▒ Alt.C



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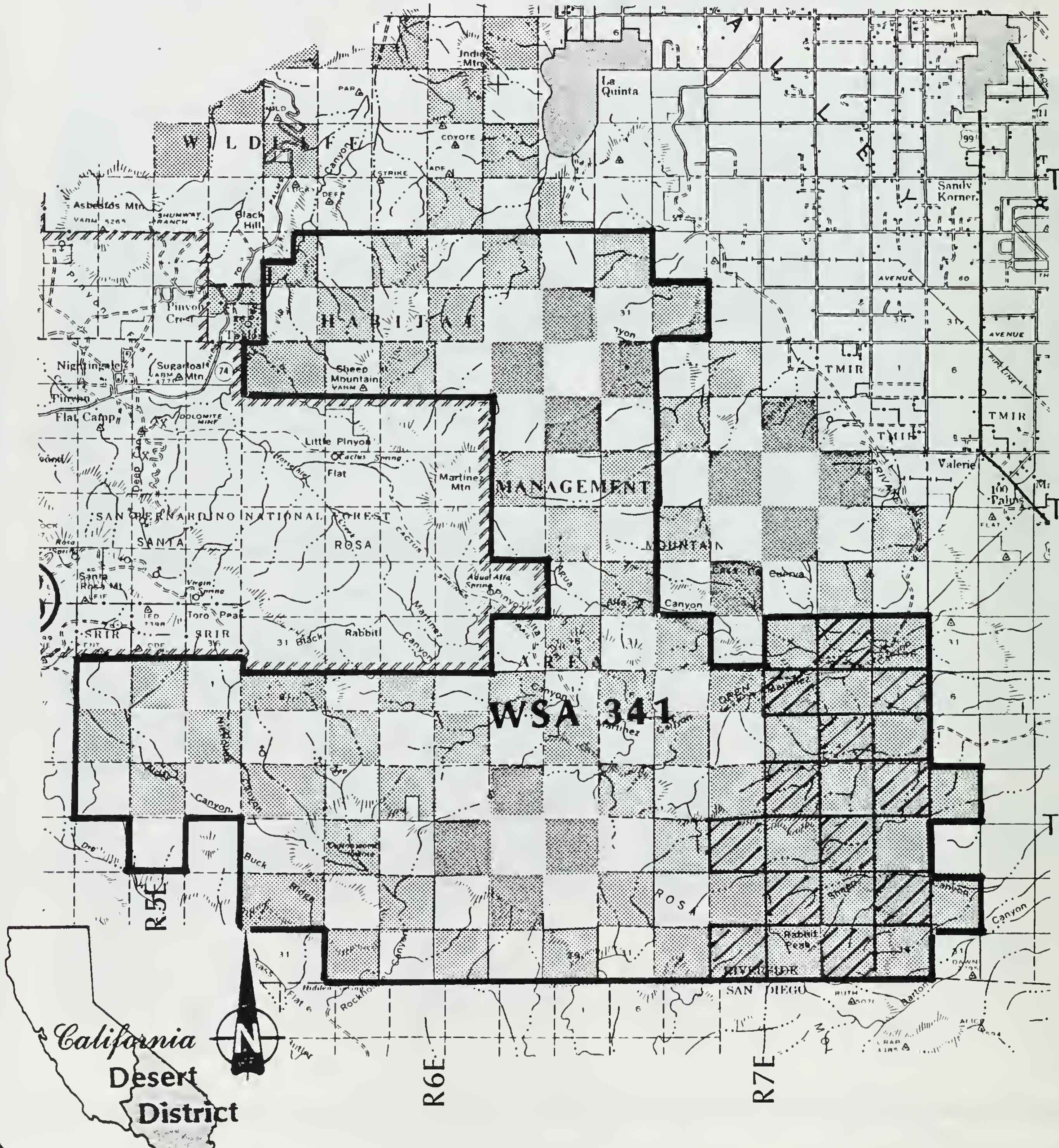
Amendment 13
WSA 341
Santa Rosa Mtns

▭
- Alt. A
Change WSA from "C" to "L"
and designate as ACEC
- Alt. B
Change WSA from "C" to "L"

▨ Split Estate land



Form 1279–3
(June 1984)

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